

ORIGINAL

DOCKET FILE COPY ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED

OCT 13 1994

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )

Equal Access and Interconnection )  
Obligations Pertaining to )  
Commercial Mobile Services )

CC Docket No. 94-54  
RM-8012

**MCI REPLY COMMENTS**

MCI TELECOMMUNICATIONS CORPORATION .

Larry A. Blosser  
Donald J. Elardo  
1801 Pennsylvania Ave., N.W.  
Washington, D.C. 20006  
(202) 887-2006

Its Attorney

Dated: October 13, 1994

No. of Copies rec'd  
List ABCDE

074

## Table of Contents

<u>Item</u>	<u>Page</u>
SUMMARY . . . . .	ii
DISCUSSION . . . . .	1
A. Equal Access . . . . .	1
B. LEC-CMRS Interconnection . . . . .	6
C. CMRS-CMRS Interconnection . . . . .	10
CONCLUSION . . . . .	12

### Summary

The Commission should adopt uniform equal access requirements for cellular and extend those requirements to all similarly-situated CMRS providers. CMRS equal access should incorporate the principal features of equal access in the landline telephone industry, including 1+ presubscription, balloting and allocation. CMRS subscribers, like landline telephone subscribers, should have the freedom to choose from among competing providers of long distance services.

The Commission should consider utilizing the existing contract-tariff mechanism for LEC-CMRS interconnection arrangements. With contract-tariffs, carriers would enjoy the flexibility to negotiate individualized interconnection agreements, as they do today. The essential terms of the agreement would be tariffed, allowing interested parties to make more informed decisions in purchasing interconnection arrangements.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

RECEIVED  
OCT 13 1994  
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of )  
 )  
Equal Access and Interconnection ) CC Docket No. 94-54  
Obligations Pertaining to ) RM-8012  
Commercial Mobile Services )

MCI REPLY COMMENTS

MCI Telecommunications Corporation (MCI), by its attorneys, hereby submits its reply comments in the above-captioned proceeding. MCI urges the Commission to adopt uniform cellular equal access requirements, as proposed in the Notice of Proposed Rulemaking (Notice), and to extend those requirements to all similarly-situated providers of commercial mobile radio services (CMRS).

DISCUSSION

A. Equal Access

CMRS Equal Access. The Commission should resist the temptation to adopt an equal access policy that is based upon an anticipated market structure (two cellular carriers, four or five new PCS, one SMR) which may never materialize. Although there appears to be a large and growing demand for wireless services, the supply side availability of these services (identity of suppliers, timing, geographic scope) cannot reliably be predicted. Therefore, the principal focus of this proceeding should be on the extension of equal access -- which is already available to

between 60 and 75% of all cellular subscribers -- to all other CMRS subscribers.

Costs and Benefits of Equal Access. Although the opponents of equal access claim that the costs of implementation will be high, those claims are not extensively documented,<sup>1/</sup> and are often premised upon unsupported assumptions.<sup>2/</sup> Whatever the true costs may be, the Commission can take official notice of the fact that the costs of conversion have not deterred either AT&T or the BOCs from acquiring non-equal access systems and converting them to equal access.<sup>3/</sup>

Opponents of equal access claim that competition among IXC exists, insofar as IXCs compete with one another to sell bulk-rate long distance service to cellular carriers, who package long distance service with airtime and pass the savings along to cellular subscribers. However, in non-equal access markets,

---

<sup>1/</sup> See, e.g., GTE at 17 ("more than \$23,000,000").

<sup>2/</sup> TDS' cost estimates include a T1 for each IXC participating in equal access, assumed to be three per market. Existing cellular interconnection arrangements can combine cellular traffic destined for multiple IXCs on a single transmission facility between an MTSO and a LEC access tandem. [One example is GTE Telephone Operations' "Type 2T Interconnection."] This one item in TDS' cost estimates, therefore, may be overstated by a factor of three. Similarly, Nextel appears to assume that ESMRs will bear the full cost ("millions of dollars") of hardware and software modifications necessary to add equal access capabilities to Northern Telecom's GSM-based switches. It is far more reasonable to assume that those costs will be shared among all companies, including new PCS entrants, using this switching platform.

<sup>3/</sup> See, e.g., Telecommunications Reports, October 10, 1994 at 47, reporting the sale by USCC (a TDS subsidiary), of the Watertown, NY cellular system to Southwestern Bell.

these "savings" -- if they exist at all, and the cellular industry has not demonstrated that they are universal -- are frequently limited to calls within or between commonly owned cellular service areas. On calls that terminate outside the cellular service areas, non-equal access cellular carriers typically buy long distance in bulk, reprice long distance at AT&T dial-1 rates, and pocket the difference.<sup>4/</sup> Depending upon the long distance calling patterns of a particular cellular subscriber, the one-size-fits-all airtime and long distance packages typically offered by non-equal access cellular carriers may cost less than if long distance services were purchased separately from local calling and airtime, or considerably more. There are those who claim that equal access would allow cellular customers to "unwittingly select a more expensive carrier for their long distance traffic."<sup>5/</sup> Even if it could be shown that most cellular subscribers would realize some cost savings if there were no equal access, customers in a market economy should still be free to choose their long distance supplier. Competition is not just

---

<sup>4/</sup> NYNEX at 5. Compare Vanguard at 14 and accompanying Jones Declaration, purporting to show savings of \$45,749 per month vs. AT&T intrastate dial-1 rates for intrasystem calls, with Vanguard Cellular Systems, Inc. Tariff FCC No. 1 (cancelled per Commission order) incorporating by reference AT&T dial-1 rates for interstate calls. Vanguard's cellular subscribers who make a large number of interstate appear to reap none of the advantages of Vanguard's ability to buy long distance in bulk; it appears that Vanguard, on interstate calls, "mark[s] up long distance prices and pocket[s] the surplus." NYNEX, at 5.

<sup>5/</sup> Rural Cellular Association at 8.

price competition; there are other benefits of equal access, not the least of which is the ability to choose among competitors.<sup>6/</sup>

Some parties claim that there is no significant demand for cellular equal access. They assert that if there were appreciable customer demand for cellular equal access, the market share of the equal access provider (e.g., a BOC affiliate) should be higher than its non-equal access competitor. These parties ignore the fact that, as evidenced by the DOJ competitive impact statement on the BOCs' wireless waivers, there exists a substantial demand among large business customers for equal access.<sup>7/</sup> In a market where a non-equal access cellular company (e.g., GTE) competes with a BOC affiliate, it may not be necessary for a large corporate customer (one with 500, a thousand or more cellular phones on the non-equal access system) to actually shift its account to the equal access system. The possibility that a major account will be lost to a competitor often results in the successful negotiation of an interconnection agreement between the non-equal access cellular system and corporate private network; no net migration of traffic is necessary. In today's cellular environment, only very large business customers can

---

<sup>6/</sup> GTE, at 26, names several offerings that it has developed to "protect cellular subscribers and carriers from fraud." As described in MCI's initial comments, MCI's Vnet cellular offers similar fraud-prevention capabilities. With equal access, customers would be better able to select, from among these and other competing offerings, those which best suited their needs.

<sup>7</sup> Memorandum of the United States in Response to the Bell Companies' Motions for Generic Wireless Waivers, Civil Action No. 82-0192 HHG (U.S. District Court for the District of Columbia), dated July 25, 1994, at 29.

exercise this degree of bargaining power; adoption of uniform equal access requirements for all CMRS would extend the benefits of freedom of choice to smaller businesses and individual consumers.

If equal access were available in all cellular and competing CMRS markets, the potential for a wider range of offerings would be enhanced. Some commenters were critical of the failure of the long distance industry to develop and market cellular-specific calling plans. Business-oriented plans, such as Vnet cellular, already exist and are being marketed through business sales channels. In the consumer segment, the absence of a uniform equal access requirement poses a significant obstacle to the development and marketing of cellular-specific calling plans. If equal access were available on all wireless systems, the opportunity to develop cellular specific calling plans for consumer and small business segments and to market them through mass market channels would likely lead to the rapid proliferation of such plans.

Equal Access Definition. Some opponents of CMRS equal access assert that any demand for access to competing long distance providers can be satisfied by some form of alternate dialing arrangement and that, therefore, 1+ equal access is unnecessary. Airtouch, for example, contends that 10XXX is an adequate substitute for equal access. Others contend that various dial-around arrangements, such as 800-, 950- and calling card arrangements are adequate substitutes for 1+ equal access.



These or similar contentions have been made in equal access proceedings, both before this Commission and elsewhere, and have been almost universally rejected in favor of 1+ presubscription, which places all long-distance carriers on an equal footing.

B. LEC-CMRS Interconnection

In its Comments, MCI argued that, consistent with its established policies, the Commission should require that LECs tariff their interconnection arrangements with CMRS providers. The rationale for this approach is straight-forward. As monopoly service providers, the LECs possess market power or the ability to engage in discriminatory and anti-competitive conduct relative to serving unaffiliated CMRS carriers. The tariffing process would help deter LECs from engaging in such conduct by subjecting their practices to greater public scrutiny and closer Commission supervision. As MCI noted, tariffing is particularly important when the Commission does not require the structural separation of LECs from their wireless affiliates.<sup>8/</sup>

Those who oppose tariffing argue that "good faith negotiation" is all that is needed to provide the flexibility required and that tariffing would result in the Commission -- rather than the marketplace -- deciding service arrangements. Further, they claim, tariffing would result in litigation and would lead to "significant costs and burdens" that would divert resources from other important undertakings. Finally, they assert that the

---

<sup>8/</sup> MCI at 11-13.

Commission's complaint and alternative dispute resolution processes are sufficiently effective in resolving interconnection challenges and issues.<sup>9/</sup>

Each of these is without merit. The Commission has an existing mechanism under which LEC-CMRS interconnection tariffs could be accommodated, namely contract tariffs.<sup>10/</sup> This provides flexibility to negotiate individual interconnection contracts, as is done today, and at the same time ensures that those arrangements are made generally available.

Contract tariffs would allow the Commission to exercise more effective supervision over LEC-CMRS interconnection practices than in the absence of such tariffs<sup>11/</sup> and they would not require the tariffing of contract detail.<sup>12/</sup> Once filed, the same

---

<sup>9/</sup> See, e.g., Cellular Telecommunications Industry Association at 15-25; Southwestern Bell at 62-66; NYNEX at 11-12; Personal Communications Industry Association at 11-13.

<sup>10/</sup> Section 61.55 requires the tariffing of (1) the term of the contract; (2) the services provided under the contract; (3) minimum volume commitments for each service; (4) the contract price for each service at the volume levels to which the customer committed; (5) a general description of any volume discounts under the contract; and (6) a general description of any classifications, practices and regulations affecting the contract rate. Competition in the Interstate Interexchange Marketplace, 6 FCC Rcd at 5902. These requirements should also apply to LEC-CMRS tariff filings, in addition to a requirement that the tariff include a brief description of the technical and operational features of the services being provided under the contract.

<sup>11/</sup> See Competition in the Interstate Interexchange Marketplace, 6 FCC Rcd 5880, 5897-5903 (1990), recon., 6 FCC Rcd 7569 (1991), further recon., 7 FCC Rcd 2677 (1992).

<sup>12/</sup> See Section 61.55 of the Commission's Rules and Regulations.

arrangement would need to be available to other parties for some reasonable period of time.

Contract tariffs for LEC-CMRS interconnection would have significant public interest benefits. Interested parties could make more informed decisions in purchasing interconnection arrangements. This will inevitably allow CMRS providers to secure more economically and technically efficient arrangements. (This is particularly important to new CMRS entrants attempting to secure interconnection arrangements at least as favorable as those negotiated by the established CMRS providers against whom they may be competing.) Imposing a general non-tariff "most favored nation" contractual obligation on LECs clearly would not be satisfactory simply because it would be impossible, absent litigation and discovery, to know whether there is compliance with that obligation. Moreover, if the Commission were to permit parties filing contract tariffs to mask or redact information (such as network configuration, number and type of trunks, lines and switch ports) that they contended is competitively sensitive, the tariff would not likely provide information essential to CMRS providers and the Commission.

Finally, the "burdens and costs" refrain of parties objecting to tariffing LEC interconnection arrangements cannot be taken seriously. The LECs' existing tariffing resources -- which routinely generate a host of interconnection tariff filings -- could efficiently handle the task of filing CMRS contract tariffs

covering both existing arrangements and new ones.<sup>13/</sup> Moreover, it is self-evident that the task of filing tariffs would not be so resource intensive as to disrupt LEC "network upgrades" and construction programs.

Also, contrary to the claims of the opponents, a tariffing requirement would not promote unnecessary litigation; nor are the Section 208 complaint and alternative dispute resolution processes satisfactory substitutes for LEC interconnection tariffs. These opponents simply miss the point. The purpose of requiring LECs to tariff their CMRS interconnection arrangements is to assure that those arrangements are generally available to similarly situated parties under substantially similar terms and conditions. The publication of tariffs would provide greater assurances that all CMRS carriers have the opportunity to obtain interconnection arrangements under reasonable terms and conditions. This would in all likelihood limit the prospect of litigation.

There is considerable support for requiring the LECs to tariff their CMRS interconnection arrangements.<sup>14/</sup> Indeed, Pacific Bell suggests that, if the Commission requires the filing

---

<sup>13/</sup> The LECs are also fully capable of deciding whether calls are jurisdictionally intrastate or interstate and applying the appropriate tariff, just as they do today in providing landline interconnection arrangements.

<sup>14/</sup> See, e.g., General Services Administration at 7; New York Public Service Commission at 4-5; California Public Utilities Commission at 3-4; Puerto Rico Telephone Company at 2-3. In a similar vein, AT&T (at 13) proposes that, LECs file with the Commission all CMRS carrier-carrier interconnection agreements.

of such tariffs, the expanded interconnection tariffs would provide an appropriate framework. Pacific Bell states that "[t]he primary modification that would be needed is to create an expanded interconnection cross connect specifically for interconnection to mobile services" and "rate elements for call setup and duration for switching and a transport element, as well as options for term agreements."<sup>15/</sup>

Accordingly, for the reasons stated above, it is clear that, on balancing the substantial public interest benefits resulting from the LECs' tariffing their CMRS interconnection arrangements against the costs and burdens of tariffing, the Commission should require that tariffs be filed.

#### C. CMRS-CMRS Interconnection

The Commission has plenary authority under Section 201(a) of the Communications Act to require that CMRS providers interconnect with one another. In the interest of stimulating the most productive use of CMRS services, the Commission should exercise that authority, but it should refrain at this juncture from prescribing the terms of such interconnection. The opponents of mandatory CMRS-CMRS interconnection argue that the marketplace is currently addressing effectively the need for such interconnection, and that, accordingly, it is unnecessary for the Commission

---

<sup>15/</sup> Pacific Bell at 14-15.

to intervene. To do so, they claim, would impose significant and unnecessary costs on CMRS providers.<sup>16/</sup>

In fact, interconnection among CMRS carriers is presumptively in the public interest because it would assure the most rapid growth and dissemination of mobile services. Accordingly, it is appropriate for the Commission to require, as a matter of policy, such interconnection among CMRS providers and to stand ready to intercede in the event a CMRS provider refuses to interconnect. However, it is not necessary for the Commission to prescribe details regarding interconnection arrangements unless the CMRS providers are unable to resolve any differences that may arise. A broad Commission policy position favoring interconnection should provide a powerful incentive for even a recalcitrant CMRS carrier to agree to a reasonable interconnection request.

---

<sup>16/</sup> See, e.g., BellSouth at 12-14; McCaw at 5-18; Bell Atlantic at 15-17.

CONCLUSION

For the reasons set forth herein and in MCI's initial comments, the Commission should promptly implement equal access requirements for cellular licensees and for all similarly-situated providers of CMRS, and adopt LEC-CMRS interconnection requirements consistent with the recommendations set forth herein.

Respectfully submitted,  
MCI TELECOMMUNICATIONS CORPORATION

By:



Larry A. Blosser  
Donald J. Elardo  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006  
(202) 887-2727

Its Attorneys

Dated: October 13, 1994

CERTIFICATE OF SERVICE

I, Karen Dove, hereby certify that on this 13th day of October, 1994, a true copy of the foregoing "Reply Comments," in CC Docket No. 94-54, RM-8012, was served U.S. First Class Mail, Postage Prepaid, or Hand Delivered, upon each of the parties listed below.

Thomas J. Casey  
Jay L. Birnbaum  
David Pawlik  
Skadden, Arps, Slate, Meagher & Flom  
1440 New York Ave., N.W.  
Washington, D.C. 20005

Leonard J. Kennedy  
Laura H. Phillips  
Richard S. Denning  
Dow, Lohnes & Albertson  
1255 23rd Street, N.W.  
Washington, D.C. 20037

Gary M. Epstein  
James H. Barker  
Latham & Watkins  
Suite 1300  
1001 Pennsylvania, Ave., N.W.  
Washington, D.C. 30004-2505

Richard C. Rowleson  
Vanguard Cellular Systems, Inc.  
2002 Pisgah Church Road  
Suite 300  
Greensboro, NC 27455

Michael F. Altschul  
Randall S. Coleman  
Cellular Telecommunications Industry  
Association  
1250 Connecticut Ave., N.W.  
Suite 200  
Washington, D.C. 20036

Philip L. Verveer  
Melissa E. Newman  
Jennifer A. Donaldson  
Willkie, Farr & Gallagher  
Three Lafayette Centre  
1155 21st Street, Suite 600  
Washington, D.C. 20036-3384

Gail L. Polivy  
GTE Service Corporation  
1850 M Street, N.W.  
Suite 1200  
Washington, D.C. 20036

William J. Sill  
Nancy L. Killien  
McFadden, Evans & Sill  
1627 Eye Street, N.W.  
Suite 810  
Washington, D.C. 20006

Wayne Watts  
Carol Tacker  
Bruce Beard  
Southwestern Bell Mobile Systems,  
Inc.  
17330 Preston Road, Suite 100A  
Dallas, TX 75252

James D. Ellis  
Mary Marks  
175 E. Houston, Suite 1306  
San Antonio, TX 78205

James P. Tuthill  
Betsy Stover Granger  
Pacific Bell Mobile Services  
140 New Montgomery St., Room 1525  
San Francisco, CA 94105

James L. Wurtz  
Pacific Bell Mobile Services  
1275 Pennsylvania Ave., N.W.  
Washington, D.C. 20004

Edward R. Wholl  
William J. Balcerski  
New York Telephone Company,  
New England Telephone and  
Telegraph Company, and  
NYNEX Mobile Communications  
Company  
120 Bloomingdale Road  
White Plains, NY 10605

Scott K. Morris  
McCaw Cellular Communications, Inc.  
5400 Carillon Point  
Kirkland, Washington 98033

Cathleen A. Massey  
McCaw Cellular Communications, Inc.  
4th Floor  
1150 Connecticut Ave., N.W.  
Washington, D.C. 20036



Howard J. Symons  
Christopher J. Harvie  
Cherie R. Kiser  
Mintz, Levin, Cohn, Ferris, Glovsky  
and Popeo, P.C.  
Suite 900  
701 Pennsylvania Ave., N.W.  
Washington, D.C. 20004

Mark C. Rosenblum  
Robert J. McKee  
Albert M. Lewis  
Clifford K. Williams  
AT&T Corp.  
Room 2255F2  
295 North Maple Avenue  
Basking Ridge, NJ 07920

Thomas Gutierrez  
J. Justin McClure  
Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1111 Nineteenth Street, N.W.  
Suite 1200  
Washington, D.C. 20036

Christine M. Gill  
Tamara Y. Davis  
Keller & Heckman  
1001 G Street, N.W.  
Suite 500, West  
Washington, D.C. 20001

Bob F. McCoy  
Joseph W. Miller  
John C. Gammie  
WilTel, Inc.  
Suite 3600  
One Williams Center  
Tulsa, OK 74172

Norman P. Leventhal  
Raul R. Rodriguez  
Stephen D. Baruch  
J. Breck Blalock  
Leventhal, Senter & Lerman  
2000 K Street, N.W.  
Suite 600  
Washington, D.C. 20006

Bruce Asay  
2515 Pioneer Avenue  
Cheyenne, WY 82001

Lewis J. Paper  
David B. Jeppsen  
Keck, Mahin & Cate  
1201 New York Ave., N.W.  
Washington, D.C. 20005-3919

Paul Rodgers  
Charles D. Gray  
James Bradford Ramsay  
NARUC  
1102 ICC Building  
P.O. Box 684  
Washington, D.C. 20044

R. Bruce Easter, Jr.  
Davis, Wright, Tremaine  
Claircom Communications Group,  
L.P.  
Suite 600  
701 Pennsylvania Ave., N.W.  
Washington, D.C. 20004-2608

Joel H. Levy  
William B. Wilhelm, Jr.  
Cohn and Marks  
Suite 600  
1333 New Hampshire Ave., N.W.  
Washington, D.C. 20036

Richard Liebeskind  
Johathan M. Rich  
Luin P. Fitch, Jr.  
Deborah R. Maisel  
Brent E. Marshall  
Don Allen Resnikoff  
N. Scott Sacks  
Kathleen M. Soltero  
Communications & Finance Section  
U.S. Department of justice  
555 Fourth Street, N.W.  
Washington, D.C. 20001

Anne K. Bingaman  
Robert E. Litan  
Antitrust Division  
U.S. Department of justice  
Washington, D.C. 20530

David E. Weisman  
Alan S. Tiller  
Meyer, Faller, Weisman and  
Rosenberg, P.C.  
4400 Jenifer Street, N.W.  
Suite 380  
Washington, D.C. 20015

Russell H. Fox  
Susan H. R. Jones  
Gardner, Carton & Douglas  
1301 K Street, N.W.  
Suite 900, East Tower  
Washington, D.C. 20005

J. Jeffrey Craven  
D. Cary Mitchell  
Besozzi, Gavin & Craven  
1901 L Street, N.W.  
Suite 200  
Washington, D.C. 20036

David Cosson  
Steven E. Watkins  
National Telephone Cooperative  
Association  
2626 Pennsylvania Ave., N.W.  
Washington, D.C. 20037

Lon C. Levin  
AMSC Subsidiary Corporation  
10802 Parkridge Blvd.  
Reston, VA 22091

Bruce D. Jacobs  
Glenn S. Richards  
Fisher, Wayland, Cooper, Leader  
& Zaragoza  
2001 Pennsylvania Ave.  
Suite 400  
Washington, D.C. 20006

Pamela Riley  
AirTouch Communications  
425 Market Street  
San Francisco, CA 94105

David A. Gross  
Kathleen Q. Abernathy  
AirTouch Communications  
1818 N Street, N.W.  
Washington, D.C. 20554

Roy L. Morris  
Allnet Communications Services, Inc.  
1990 M Street, N.W.  
Suite 500  
Washington, D.C. 20036

Diane Smith  
Alltel Mobile Communications, Inc.  
Two Financial Centre, Suite 401  
10825 Financial Parkway  
Little Rock, AR 72211

Alan R. Shark  
Jill M. Lyon  
American Mobile Telecommunications  
Association, Inc.  
1150 18th Street, N.W.  
Suite 250  
Washington, D.C. 20036

Anne V. Phillips  
American Personal Communications  
1025 Connecticut Ave., N.W.  
Washington, D.C. 20036

Kenneth E. Hardman  
Michael B. Azeez  
Moir & Hardman  
2000 L Street, N.W.  
Suite 512  
Washington, D.C. 20036-4907

Peter Arth, Jr.  
Edward W. O'Neill  
Ellen S. Levine  
People of the State of California  
and the Public Utilities  
Commission of the State of  
California

505 Van Ness Avenue  
San Francisco, CA 94102

W. Bruce Hanks  
Century Cellunet, Inc.  
100 Century Park Avenue  
Monroe, LA 71203

William D. Baskett III  
Thomas E. Taylor  
David S. Bence  
Frost & Jacobs  
2500 PNC Center  
201 East Fifth Street  
Cincinnati, OH 45202-4182

John A. Malloy  
Columbia PCS, Inc.  
201 North Union, Suite 410  
Alexandria, VA 22314

Werner K. Hartenberger  
Laura H. Phillips  
Steven F. Morris  
Dow, Lohnes & Albertson  
1255 Twenty-Third Street, N.W.  
Suite 500  
Washington, D.C. 20037

Daniel C. Riker  
DCR Communications, Inc.  
2715 M Street, N.W.  
Washington, D.C. 20007

Gerald S. McGowan  
Terry J. Romine  
Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1111 19th Street, N.W.  
Suite 1200  
Washington, D.C. 20036

David L. Hill  
Audrey P. Rasmussen  
O'Connor & Hannan  
1919 Pennsylvania Ave., N.W.  
Suite 800  
Washington, D.C. 20006-3483

Peter A. Rohrbach  
Karis A. Hastings  
Hogan & Hartson L.L.P.  
Columbia Square  
555 Thirteenth Street, N.W.  
Washington, D.C. 20004

Catherine R. Sloan  
LDDS Communications, Inc.  
Suite 400  
1825 Eye Street, N.W.  
Washington, D.C. 20006

James F. Rogers  
Latham & Watkins  
1001 Pennsylvania Ave., N.W.  
Suite 1300  
Washington, D.C. 20004

David A. Reams  
Grand Broadcasting Corporation  
P.O. Box 502  
Perrysburg, OH 43552

Michael S. Hirsch  
Geotek Communications, Inc.  
1200 19th Street, N.W.  
Suite 607  
Washington, D.C. 20036

Emily C. Hewitt  
Vincent L. Crivella  
Michael J. Ettner  
Tenley A. Carp  
General Services Administration  
18th & F Streets, N.W.  
Room 4002  
Washington, D.C. 20405

William J. Cowan  
Penny Rubin  
Mary E. Burgess  
New York Department of Public  
Service  
Three Empire State Plaza  
Albany, NY 12223

Robert S. Foosaner  
Lawrence R. Krevor  
Laura L. Holloway  
Nextel Communications, Inc.  
800 Connecticut Ave., N.W.  
Suite 1001  
Washington, D.C. 20006

Michael R. Carper  
OneComm Corporation  
4643 Ulster Street  
Suite 500  
Denver, CO 80237

Lisa M. Zaina  
OPASTCO  
21 Dupont Circle, N.W.  
Suite 700  
Washington, D.C. 20036

David L. Nace  
Marci E. Greenstein  
Gerald S. McGowan  
George L. Lyon, Jr.  
John B. Branscome  
Lukas, McGowan, Nace & Gutierrez,  
Chartered  
1111 19th Street, N.W.  
Twelfth Floor  
Washington, D.C. 20036

Judith St. Ledger-Roty  
Paul G. Madison  
Reed, Smith, Shaw & McClay  
1200 18th Street, N.W.  
Washington, D.C. 20036

Mark J. Golden  
Personal Communications Industry  
Association  
1019 19th Street, N.W.  
Washington, D.C. 20036

John Hearne  
Alvin Souder  
Point Communications Company  
100 Wilshire Blvd., Suite 1000  
Santa Monica, CA 90401

Joe D. Edge  
Richard J. Arsenault  
Drinker, Biddle & Reath  
901 Fifteenth Street, N.W.  
Suite 900  
Washington, D.C. 20006

Jonathan L. Wiener  
Daniel S. Goldberg  
Goldberg, Godles, Wiener & Wright  
1229 Nineteenth Street, N.W.  
Washington, D.C. 20036

Deborah Lipoff  
Rand, McNally & Company  
8255 North Central Park  
Skokie, IL 60076

Ernest T. Sanchez  
Baker & McKenzie  
815 Connecticut Ave., N.W.  
Suite 900  
Washington, D.C. 20006

Michael J. Shortley, III  
Rochester Telephone Corporation  
180 South Clinton Ave.  
Rochester, NY 14646

Caressa D. Bennet  
Rural Cellular Association  
2120 L Street, N.W.  
Suite 520  
Washington, D.C. 20037

Theresa Fenelon  
Pillsbury, Madison & Sutro  
1667 K Street, N.W.  
Suite 1100  
Washington, D.C. 20006

Peter P. Basserman  
SNET Mobility, Inc.  
555 Long Wharf Drive  
New Haven, CT 06511

George Y. Wheeler  
Peter M. Connolly  
Koteen & Naftalin  
1150 Connecticut Ave., N.W.  
Suite 1000  
Washington, D.C. 20036

Carl W. Northrop  
Bryan Cave  
Triad Utah, L.P.  
Suite 700  
700 13th Street, N.W.  
Washington, D.C. 20005

Martin W. Bercovici  
Keller and Heckman  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Gurman, Kurtis, Blask & Freedman  
Chartered  
1400 16th Street, N.W.  
Suite 500  
Washington, D.C. 20036

  
Karen Dove